

MULLIN HOARD & BROWN, L.L.P.

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Gibson Investments, Wendell Lee Gibson and Paula Gibson

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

In Re:	§	
	§	
GIBSON FARMS	§	Case No. 20-20271-RLJ-11
	§	
Debtor.	§	
In Re:	§	
	§	
NATURE'S WAY COMPOST, LLC	§	Case No. 20-20272-RLJ-11
	§	(Jointly Administered Under
	§	Case No. 20-20271-RLJ-11)
	§	
Debtor.	§	
In Re:	§	
	§	
GIBSON INVESTMENTS	§	Case No. 20-20273-RLJ-11
	§	(Jointly Administered Under
	§	Case No. 20-20271-RLJ-11)
	§	
Debtor.	§	
In Re:	§	
	§	
WENDELL LEE GIBSON and wife, PAULA GIBSON	§	Case No. 20-20274-RLJ-11
	§	(Jointly Administered Under
	§	Case No. 20-20271-RLJ-11)
	§	
Debtors.	§	

**WITNESS AND EXHIBIT LIST OF DEBTORS FOR
HEARING SCHEDULED FOR OCTOBER 8, 2020**

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

NOW COME, GIBSON FARMS, NATURE'S WAY COMPOST, LLC, GIBSON INVESTMENTS, and WENDELL LEE GIBSON and wife, PAULA GIBSON (the "Debtors"),

(the “Debtors”), the Debtors in the above-referenced bankruptcy proceeding and files this Witness & Exhibit List for Hearing Scheduled for October 8, 2020.

WITNESSES

Debtors disclose that they may call the following individuals to provide testimony:

1. Paula Gibson, Debtor;
2. Audrey Gibson;
3. Robert Wolfe, Partner of Frost, PLLC, CPA’s; and
4. Tami Sagniere, Sagniere Consulting, Canyon, Texas

Debtors reserve the right to amend this Witness List and to call other witnesses as may be necessary for rebuttal or impeachment purposes. Debtors also reserve the right to call any witnesses designated or called by any other party to these proceedings.

EXHIBITS

Debtors disclose that they may introduce the following exhibits:

TAB	DESCRIPTION
1.	Cash Flow Projections for Gibson Farms
2.	Cash Flow Projections for Nature’s Way Compost, LLC
3.	Cash Flow Projections for Gibson Investments
4.	Personal budget for Lee & Paula Gibson
5.	Summary of projected collateral values for Rabo Agrifinance, Inc. notes
6.	Statements for balances owed on Rabo Agrifinance, Inc. notes as of Sept. 10, 2020

Debtors reserve the right to amend this Exhibit List in order to supplement the list of documents that may be introduced. Debtors also reserve the right to introduce other exhibits as

may be necessary for impeachment purposes. Debtors also reserve the right to introduce exhibits designated by any other party to these proceedings.

Respectfully Submitted,

MULLIN HOARD & BROWN, L.L.P.

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/s/ David R. Langston

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***Attorneys for Debtors, Gibson Farms, Nature's
Way Compost, LLC, Gibson Investments and
Wendell & Paula Gibson***

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served regular U.S. Mail, postage prepaid and/or via ECF on the parties in interest listed below on this 7th day of October, 2020:

1. Wendell & Paula Gibson
Gibson Farms, Gibson Investments
and Nature's Way Compost, LLC
P.O. Box 777
Dumas, Texas 79029
Debtors
2. U.S. Trustee's Office
1100 Commerce St., Room 9C60
Dallas, Texas 75242
3. Heath Hendricks
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600 Maxo Building
320 South Polk Street
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hhendricks@rineymayfield.com
Attorney for Rabo Agrifinance
4. Michael R. Johnson
RAY QUINNEY & NEBEKER P.C.
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Salt Lake City, UT 84111

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Attorneys for Rabo Agrifinance, Inc.

5. Donna Webb
U.S. Attorney's Office
1100 Commerce St., Ste. 300
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Attorney for U.S. Small Business Administration
6. All parties receiving notice via ECF in this case.

/s/ David R. Langston

David R. Langston